

April 8, 2020

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Subject: Quarterly Progress Report – CERCLA Projects, Smoky Canyon Mine  
Pole Canyon 2006 NTCRA (Water Management)  
Pole Canyon 2013 NTCRA (Cover System)  
Remedial Investigation/Feasibility Study  
January through March 2020 (First Quarter of 2020)

Dear Art,

This First Quarter 2020 Progress Report describes work performed, deliverables and data transmittals for the period from January through March 2020, and identifies upcoming activities associated with the following CERCLA projects at the Smoky Canyon Mine:

- Pole Canyon Overburden Disposal Area (ODA) Non-Time-Critical Removal Actions (NTCRAs) Performance and Effectiveness Monitoring
- Remedial Investigation/Feasibility Study (RI/FS)

### **Work Performed, Including Deliverables and Data Transmittals**

#### **Pole Canyon ODA NTCRAs Performance and Effectiveness Monitoring**

Two NTCRAs have been implemented at the Pole Canyon ODA. The first, the Pole Canyon Water Management NTCRA (2006 NTCRA) was implemented in accordance with the *2006 Administrative Settlement Agreement and Order on Consent (ASAOC)*. The second, the Pole Canyon Dinwoody/Chert Cover NTCRA (2013 NTRCA) was implemented under a separate *2013 ASAOC*. The following effectiveness monitoring activities were conducted from January through March 2020 under the *Pole Canyon NTCRA Effectiveness Monitoring Plan (EMP), Rev. No. 5*:

- Water levels were monitored and recorded continuously at one Wells Formation monitoring well (GW-16) and three alluvial monitoring wells (GW-15, GW-22, and GW-26).
- Flow was monitored and recorded continuously at surface water monitoring stations LP-1 and UP-IN. Flow was also monitored continuously at the pipeline outlet (LP-PD) structure, with telemetry access available for regular tracking of transducer measurements. Telemetry access for the transducer at the pipeline inlet structure (UP-PD) is currently unavailable and it appears the communication cable is damaged. Winter conditions have prevented the transducer from being

retrieved and replaced and the transducer will be replaced this spring as conditions allow.

A Draft Removal Action (RA) Report for the 2013 NTCRA was submitted to the Agencies on February 5. The report documents cleanup activities undertaken at the Pole Canyon ODA and provides Simplot's certification that all removal actions objectives outlined in the 2013 United States Forest Service (USFS) Action Memorandum have been met.

#### Remedial Investigation/Feasibility Study

Performance monitoring of the Phase 2 Ultra-Filtration/Reverse Osmosis and Fluidized Bed Bioreactor (UF/RO+FBR) water pilot treatment system at Hoopes Spring is ongoing. Results from the performance monitoring are being provided to the Agencies in monthly progress reports specific to the project.

The Draft Feasibility Study Technical Memorandum (FSTM) #2 was submitted to the Agencies on April 6. The memorandum documents the development and screening of media-based remedial alternatives and the results of the detailed and comparative analyses and identifies the recommended Site-wide remedy for Smoky Canyon Mine.

#### **Upcoming Activities**

##### Pole Canyon ODA NTCRA's Performance and Effectiveness Monitoring

- Conduct second quarter (spring) 2020 surface water flow measurements and sampling at the locations identified in Table 3-2 of the *Pole Canyon NTCRA EMP Rev. No. 5*.
- Ongoing continuous flow monitoring at UP-PD, UP-IN, LP-PD, and LP-1.
- Ongoing continuous water-level monitoring at one Wells Formation monitoring wells (GW-16) and three alluvial monitoring wells (GW-15, GW-22, and GW-26).
- Conduct the spring inspections of the 2006 and 2013 NTCAs per the *Post-Removal Site Control (PRSC) Plans*.

#### Remedial Investigation/Feasibility Study

- Continue bi-weekly UF/RO+FBR operation and monitoring in accordance with the Phase 2 Work Plan.

Please contact me if there are questions regarding this submittal.

Sincerely,



Jeffrey Hamilton  
Environmental Engineer

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